

Bryan L.P. Saalfeld - 243331  
BSaalfeld@mpbf.com  
Thomas F. Mazzucco – 306681- pending admission  
AAndrade@mpbf.com  
MURPHY, PEARSON, BRADLEY & FEENEY  
580 California Street, Suite 1100  
San Francisco, California, 94104  
Telephone: (415) 788-1900  
Facsimile: (415) 393-8087

Attorneys for Plaintiffs  
DAKAVIA MANAGEMENT CORP.;  
MONTE VISTA ESTATES, LLC; and  
LAMAR ESTATES, LLC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

DAKAVIA MANAGEMENT CORP., an  
Oregon Corporation; MONTE VISTA ESTATES,  
LLC, a Colorado Limited Liability Company; and  
LAMAR ESTATES, LLC, a Colorado Limited  
Liability Company,

Plaintiffs,

v.

BRANDON BIGELOW, an individual, CURTIS  
BIGELOW, an individual RICHARD A. GREEN, an  
individual, RAZMIK ZAKARIAN, an individual,  
INVIGORATE HEALTHCARE, INC., a California  
Corporation, INVIGORATE HEALTHCARE, LLC,  
a California Limited Liability Company,  
INVIGORATE HEALTHCARE MANAGEMENT,  
LLC, a California Limited Liability Company,  
MONTE VISTA CARE HOLDINGS, LLC, a  
California Limited Liability Company, LAMAR  
HOLDINGS, LLC, a California Limited Liability  
Company, LTC MANAGEMENT HOLDINGS,  
LLC, a California Limited Liability Company, SNF  
PAYROLL, LLC, a California Limited Liability  
Company, SNF MANAGEMENT, LLC, a Delaware  
Limited Liability Company, and CHAIM RASKIN,  
an individual.

Defendants.

Case No.: 1:20-cv-00448-NONE-SKO

**JOINT STIPULATION AND ORDER  
TO CONTINUE FIRST SCHEDULING  
CONFERENCE**

(Doc. 88)

Judge: Hon. Judge Sheila K. Oberto

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA:**

IT IS HEREBY STIPULATED by and between the Plaintiffs DAKAVIA MANAGEMENT CORP.; MONTE VISTA ESTATES, LLC; and LAMAR ESTATES, LLC, and defendants RICHARD A. GREEN, an individual, RAZMIK ZAKARIAN; LTC MANAGEMENT HOLDINGS, LLC, SNF PAYROLL, LLC, SNF MANAGEMENT, LLC and CHAIM RASKIN (hereafter collectively the “parties”) that the Scheduling Conference scheduled for February 22, 2022, respectively be continued for approximately Fifty days (50) for the foregoing reasons.

(1) On January 10, 2022, the Court issued an order granting in part and denying in part Defendants LTC MANAGEMENT HOLDINGS, LLC, SNF PAYROLL, LLC, SNF MANAGEMENT, LLC and CHAIM RASKIN’s Motion to Dismiss and Motion for Sanctions, and granted Plaintiffs leave to file an amended pleading. [Dkt. 84].

(2) On January 11, 2022, Magistrate Judge Sheila K. Oberto advanced the Initial Scheduling Conference set for 7/19/2022 to 2/22/2022, at 9:30 AM, before Magistrate Judge Sheila K. Oberto.

(3) Pursuant to FRCP Rule 26(a)(1); FRCP Rule 26(f)(1), the parties recently have each met and conferred about the upcoming February 22, 2022 Initial Scheduling Conference. As part of those discussions, and in light of Plaintiffs’ intent to file a Third Amended Complaint by February 18, 2022, the parties believe that it is best to wait until the amended pleadings have been filed, evaluated, and responded to by Defendants, so that the parties can present to the Court an efficient and realistic joint scheduling report for the Court’s approval.

For the foregoing reasons, the parties stipulate to continue the Scheduling Conference by approximately Fifty days (50) to permit Plaintiffs the opportunity to amend their pleading, and to permit the Defendants the opportunity to evaluate any amended pleadings. The parties are available on the following days for a Scheduling Conference: April 20, 21, or 22, 2022.

1 DATED: February 10, 2022

MURPHY, PEARSON, BRADLEY & FEENEY

2  
3  
4 By           /s/            
Bryan L. P. Saalfeld  
Thomas F. Mazzucco  
5 Attorneys for Plaintiffs  
DAKAVIA MANAGEMENT CORP.,  
6 MONTE VISTA ESTATES, LLC &  
LAMAR ESTATES, LLC  
7

8  
9 DATED: February 10, 2022

FOLEY & LARDNER LLP

10  
11 By           /s/            
12 Nicholas M. Gross  
Attorneys for Defendants  
13 LTC MANAGEMENT HOLDINGS, LLC, a  
California Limited Liability Company, SNF  
14 PAYROLL, LLC, a California Limited Liability  
Company, SNF MANAGEMENT, LLC, a  
15 Delaware Limited Liability Company (erroneously  
sued as a California Limited Liability Company),  
16 and CHAIM RASKIN  
17

18 DATED: February 10, 2022

WHITNEY THOMPSON & JEFFCOACH

19  
20 By           /s/            
21 Timothy Thompson  
Mandy Jeffcoach  
22 Attorneys for Defendants  
RICHARD A. GREEN, an individual, RAZMIK  
23 ZAKARIAN  
24  
25  
26  
27  
28

**ORDER**

Based on the parties' foregoing stipulation (Doc. 88), and for good cause shown,

IT IS HEREBY ORDERED that the Scheduling Conference, currently set for February 22, 2022, is CONTINUED to April 19, 2022, at 9:45 a.m. in Courtroom 7 (SKO) before Magistrate Judge Sheila K. Oberto. The parties shall submit their joint scheduling report no later than seven days prior to the conference.

IT IS SO ORDERED.

Dated: **February 10, 2022**

**/s/ Sheila K. Oberto**  
UNITED STATES MAGISTRATE JUDGE

**FILER'S ATTESTATION**

I attest that other signatory listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: February 10, 2022

MURPHY, PEARSON, BRADLEY & FEENEY

By /s/ Brian L.P. Saalfeld  
Bryan L. P. Saalfeld  
Abraham M. Andrade III  
Attorneys for Plaintiffs  
DAKAVIA MANAGEMENT CORP.,  
MONTE VISTA ESTATES, LLC &  
LAMAR ESTATES, LLC